

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF ALMATY, KAZAKHSTAN and :
BTA BANK, JSC, :
Plaintiffs, : Case No. 19-civ-02645
: :
-against- : DECLARATION OF JILL
FELIX SATER, DANIEL RIDLOFF, BAYROCK : LEVI IN SUPPORT OF
GROUP INC., GLOBAL HABITAT SOLUTIONS, : MOTION TO DISMISS
INC., RRMI-DR LLC, FERRARI HOLDINGS : AMENDED COMPLAINT
LLC, and MEM ENERGY PARTNERS LLC, :
Defendants. :
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JILL LEVI, declares as follows:

1. I am a member of Todd & Levi, LLP, attorneys for Defendants Felix Sater (“Sater”), Daniel Ridloff (“Ridloff”), Bayrock Group Inc., (“Bayrock”), Global Habitat Solutions, Inc. (“GHS”) and RRMI-DR LLC (“RRMI”) (collectively, the “Moving Defendants”). I submit this Declaration in support of the Moving Defendants’ motion to dismiss the First Amended Complaint dated August 30, 2019 (the “Amended Complaint”) pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure.

2. I attach hereto as Exhibit A, a true and correct copy of the Amended Complaint.

I declare under the penalties of perjury that the foregoing is true and correct.

Dated: New York, New York
October 11, 2019

s/Jill Levi
Jill Levi